

Patrick G. Byrne  
Bradley Austin  
SNELL & WILMER  
3883 Howard Hughes Parkway  
Las Vegas, NV 89169  
Telephone: (702) 784-5200  
Facsimile: (702) 784-5252  
Email: pbyrne@swlaw.com  
Email: baustin@swlaw.com

Mark Holscher (*pro hac vice*)  
Tammy A. Tsoumas (*pro hac vice*)  
KIRKLAND & ELLIS LLP  
2049 Century Park East, Suite 3700  
Los Angeles, California 90067  
Telephone: (310) 552-4200  
Facsimile: (310) 552-5900  
Email: ttsoumas@kirkland.com  
Email: mholscher@kirkland.com

*Attorneys for Defendant*  
*Wynn Resorts, LLC*

*[Additional counsel listed on Signature Page]*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

RICHARD GIBSON, and HERIBERTO  
VALIENTE,

Plaintiffs,

v.

MGM RESORTS INTERNATIONAL,  
CENDYN GROUP, LLC, THE RAINMAKER  
GROUP UNLIMITED, INC., CAESARS  
ENTERTAINMENT INC., TREASURE  
ISLAND, LLC, WYNN RESORTS HOLDINGS,  
LLC,

Defendants.

Case No. 2:23-cv-00140-MMD-DJA

**STIPULATION AND [PROPOSED]  
ORDER TO EXTEND DEADLINE TO  
FILE THE PROPOSED DISCOVERY  
PLAN**

**(FIRST REQUEST)**

**STIPULATION**

Plaintiffs Richard Gibson and Heriberto Valiente (“Plaintiffs”) and Defendants Cendyn Group, LLC (“Cendyn”), the Rainmaker Group Unlimited, Inc. (“Rainmaker”), Caesars Entertainment, Inc. (“Caesars”), Treasure Island, LLC (“Treasure Island”), Wynn Resorts Holdings, LLC (“Wynn”), and MGM Resorts International (“MGM”) (together, “Defendants”) (collectively, Plaintiffs and Defendants are referred to herein as the “Parties”), by and through their respective counsel, for good cause shown, hereby stipulate and agree to extend LR 26-1’s deadline for the Parties to file their proposed discovery plan and scheduling order for the following reasons:

1. Defendants filed their Joint Motion to Dismiss the Complaint on March 27, 2023. (ECF No. 91). The same day, Defendant MGM filed a separate Motion to Dismiss. (ECF No. 92.)
2. Thereafter, on April 24, 2023, the Parties met and conferred in accordance with Federal Rule of Civil Procedure 26(f) and LR 26-1.
3. Pursuant to LR 26-1, the Parties’ discovery plan and scheduling order is currently due on May 8, 2023.
4. This Stipulation and amended briefing schedule has been entered into because Defendants have determined that they need additional time to continue the meet and confer process and prepare a discovery plan and scheduling order in accordance with the Local Rules, and Plaintiffs, as a professional courtesy and given the complex nature of the case, do not oppose this extension.

Accordingly, the Parties now hereby stipulate and agree, and respectfully request that the Court order, as follows:

1. The deadline for the Parties to file a Rule 26(f) proposed discovery plan and scheduling order is extended to and including Monday, May 15, 2023.

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2. This stipulation is filed in good faith and not intended to cause delay, but rather, to provide the Parties with sufficient time to work through various discovery plan issues in this multi-party class action.
3. Nothing in this stipulation is intended in any way to waive or affect the rights, claims, defenses, objections, or arguments that any party may have with respect to any matter, other than those expressly addressed and agreed herein.

**ORDER**

IT IS SO ORDERED:

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UNITED STATES MAGISTRATE JUDGE

DATED: May \_\_\_, 2023

Dated: May 4, 2023

Respectfully submitted,

/s/ Rahul Ravipudi

/s/ Steve W. Berman

Rahul Ravipudi (NV Bar No. 14750)  
Adam Ellis (NV Bar No. 14514)  
Ian P. Samson (NV Bar No. 15089)  
Email: ravipudi@psblaw.com  
Email: ellis@psblaw.com  
Email: samson@psblaw.com  
PANISH SHEA BOYLE  
RAVIPUDI LLP  
300 S. 4th Street, Suite 710  
Las Vegas, NV 89101  
Telephone: (702) 560-5520  
Facsimile: (702) 975-2515

Rio S. Pierce (*Pro Hac Vice*)  
Abby R. Wolf (*Pro Hac Vice*)  
HAGENS BERMAN SOBOL SHAPIRO  
LLP  
715 Hearst Avenue, Suite 300  
Berkeley, CA 94710  
Email: riop@hbsslaw.com  
Email: abbyw@hbsslaw.com

Brian J. Panish (NV Bar No. 16123)  
PANISH SHEA BOYLE  
RAVIPUDI LLP  
11111 Santa Monica Blvd., Suite 700  
Los Angeles, CA 90025  
Email: bpanish@psbrlaw.com

Steve W. Berman (*Pro Hac Vice*)  
Ted Wojcik (*Pro Hac Vice Forthcoming*)  
Stephanie A. Verdoia (*Pro Hac Vice*)  
HAGENS BERMAN SOBOL SHAPIRO  
LLP  
1301 Second Avenue, Suite 2000  
Seattle, WA 98101  
Email: steve@hbsslaw.com  
Email: tedw@hbsslaw.com  
Email: stephaniev@hbsslaw.com

*Attorneys for Plaintiffs Richard Gibson and  
Heriberto Valiente*

*Attorneys for Plaintiffs Richard Gibson and  
Heriberto Valiente*

/s/ Adam Hosmer-Henner

/s/ Todd L. Bice

Adam Hosmer-Henner (NSBN 12779)  
Chelsea Latino (NSBN 14227)  
Jane Susskind (NSBN 15099)  
McDONALD CARANO LLP  
100 West Liberty Street, Tenth Floor  
Reno, Nevada 89501  
(775) 788-2000  
ahosmerhenner@mcdonaldcarano.com  
clatino@mcdonaldcarano.com  
jsusskind@mcdonaldcarano.com

Todd L. Bice  
Emily A. Buchwald  
PISANELLI BICE PLLC  
400 S. 7th Street, Suite 300  
Las Vegas, NV 89101  
Telephone: 702-214-2100  
tlb@pisanellibice.com  
eab@pisanellibice.com

Boris Bershteyn (*pro hac vice*)  
Ken Schwartz (*pro hac vice*)  
Michael Menitove (*pro hac vice*)  
Sam Auld (*pro hac vice*)  
SKADDEN, ARPS, SLATE,  
MEAGHER & FLOM LLP  
One Manhattan West  
New York, New York 10001

Bethany Kristovich (*pro hac vice*)  
Kyle Mach (*pro hac vice*)  
Justin Raphael (*pro hac vice*)  
MUNGER, TOLLES & OLSON LLP  
350 S. Grand Ave.; 50th Floor  
Los Angeles, CA 90071  
Telephone: 213 683 9100  
bethany.kristovich@mto.com  
Kyle.mach@mto.com  
Justin.raaphael@mto.com

(212) 735-3000  
Boris.Bershteyn@skadden.com  
Ken.Schwartz@skadden.com  
Michael.Menitove@skadden.com  
Sam.Auld@skadden.com

*Attorneys for Defendant MGM Resorts International*

*Attorneys for Defendant  
Caesars Entertainment, Inc.*

/s/ Mark Holscher  
Patrick G. Byrne  
Nevada Bar No. 7636  
Bradley Austin  
Nevada Bar No. 13064  
SNELL & WILMER  
3883 Howard Hughes Parkway  
Las Vegas, NV 89169  
Telephone: (702) 784-5200  
Facsimile: (702) 784-5252  
pbyrne@swlaw.com  
baustin@swlaw.com

/s/ Patrick J. Reilly  
Patrick J. Reilly  
Arthur A. Zorio  
Emily Garnett (pro hac vice)  
Eric D. Walther  
BROWNSTEIN HYATT FARBER  
SCHRECK, LLP  
100 North City Parkway, Ste. 1600  
Las Vegas, NV 89106  
Telephone: 702.382.2101  
preilly@bhfs.com  
azorio@bhfs.com  
egarnett@bhfs.com  
ewalther@bhfs.com

Mark Holscher (*pro hac vice*)  
Tammy Tsoumas (*pro hac vice*)  
KIRKLAND & ELLIS LLP  
2049 Century Park East, Suite 3700  
Los Angeles, California 90067  
Telephone: (310) 552-4200  
Facsimile: (310) 552-5900  
ttsoumas@kirkland.com  
mholscher@kirkland.com

*Attorneys for Defendant Treasure Island, LLC*

/s/ J. Colby Williams  
J. Colby Williams (5549)  
710 South Seventh Street  
Las Vegas, NV 89101  
Telephone: (702) 382-5222  
Facsimile: (702) 382-0540  
jcw@cwalawlv.com

Matthew Solum (*pro hac vice*)  
KIRKLAND & ELLIS LLP  
601 Lexington Ave  
New York, NY 10022  
Telephone: (212) 446-4688  
Facsimile: (917) 848-7536  
msolum@kirkland.com

Sadik Huseny (*pro hac vice*)  
Tim O'Mara (*pro hac vice*)  
Brendan A. McShane (*pro hac vice*)  
LATHAM & WATKINS LLP  
505 Montgomery Street, Suite 2000  
San Francisco, CA 94111-6538  
Telephone: (415) 391-0600  
Facsimile: (415) 395-8095  
sadik.huseny@lw.com  
tim.o'mara@lw.com  
brendan.mcshane@lw.com

*Attorneys for Defendant Wynn  
Resorts Holdings, LLC*

Anna M. Rathbun (*pro hac vice*)  
LATHAM & WATKINS LLP

555 Eleventh Street, NW Suite 1000  
Washington, DC 20004-1304  
Telephone: (202) 637-3381  
Facsimile: (202) 637-2201  
anna.rathbun@lw.com

*Attorneys for Defendant Cendyn Group LLC*